

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of Maryland

United States of America

v.

Andre Hunt

Case No. 13-2584 BPG

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 10/29/2013 in the county of Baltimore City in the
District of Maryland, the defendant(s) violated:

Code Section

18 U.S.C. §§ 841(a)(1) & (b)(1)(A)

Offense Description

Possession with Intent to Distribute 1 Kilogram or more of Heroin

This criminal complaint is based on these facts:

See attached affidavit of TFO Corey Landing, DEA

☒ Continued on the attached sheet.


Complainant's signature

TFO Corey Landing, DEA
Printed name and title

Sworn to before me and signed in my presence.

Date: 10-31-13


Judge's signature

City and state: Baltimore, Maryland

Beth P. Gesner, U.S. Magistrate Judge
Printed name and title

BB

Affidavit

I. Purpose of the Affidavit

1. This Affidavit is submitted in support of a criminal complaint charging ANDRE HUNT with Possession with Intent to Distribute 1 Kilogram or More of Heroin, in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A). All information contained in this Affidavit, from whatever source derived, is either personally known to me or has been related to me by other sworn law enforcement personnel. This Affidavit does not contain all facts known to law enforcement officials about the investigation described herein, however no information has been omitted that would defeat a determination of probable cause.

II. Affiant Expertise

2. Your Affiant, Corey Landing, is currently assigned to BPD's Special Enforcement Section / DEA Baltimore Group 52 Heroin Task Force. Prior to this assignment, your Affiant was assigned to the Special Investigation Unit of the Violent Crime Impact Division (hereinafter "VCID") and Organized Crime Division. In the past, your Affiant has been assigned to the Mobile Enforcement Team, Northeast District patrol and Northeast District Flex unit working in a plainclothes capacity. Your Affiant's current assignment involves investigating illegal narcotics activity, target violent offenders, drug organizations and drug traffickers throughout the City of Baltimore Maryland.

3. Your Affiant has received over 100 hours of specialized training in narcotic enforcement. Your Affiant successfully completed a 40-hour block of

specialized training within the areas of identification, packaging and distribution of controlled dangerous substances (hereinafter "CDS") through the Baltimore City Police Academy. In addition, your Affiant have successfully attended an annual in-service training sponsor by the Baltimore City Police Department in areas of CDS recognition, recent case law and other police procedures within the Police Department.

4. Your Affiant has attended specialized training offered by DEA, ATF, HIDTA, Maryland State Police, Pennsylvania National Guard that includes investigative techniques of CDS investigation, CDS recognition, CDS packaging, firearm enforcement, and identifying hidden compartments that drug traffickers commonly use conceal CDS and drug proceeds. Through these classes and seminars, your Affiant obtained valuable experience in the methods of transporting, distributing, concealing CDS, identifying proceeds from CDS, and identifying drug organizations.

5. Your Affiant has arrested or participated in the arrest of over 500 persons for violations of the Maryland CDS laws, which resulted in the seizure of various types of CDS. Your Affiant has participated in the execution of more than over 100 search and seizure warrants, either as a Affiant, Affiant or raid team members where substantial amounts of CDS , firearms and U.S. currency was seized.

6. Your Affiant has become familiar with the language, terminology; street slang individuals used to purchase and distribute CDS. Your Affiant has observed CDS transactions from various covert locations. These observations have resulted in numerous street level arrests for CDS violations and the seizure of various types of CDS. Your Affiant has experience in interviewing informants, arrestee's/defendants, witnesses and other persons who have personal knowledge and experience in converting, transporting,

distributing, concealing CDS and drug proceeds from CDS trafficking from law enforcement officials. Your Affiant has participated in several wiretap investigations, involving the distribution of controlled dangerous substance, which resulted in the interception of actual drug conversation of drug traffickers and the seizure of large amounts of CDS, U.S. currency and assets.

7. Your Affiant has testified as an expert witness in drug recognition, packaging and distribution of CDS in Juvenile Court, District Court, Circuit Court of Baltimore City, as well as United States Federal Court.

III. Probable Cause

8. The following facts are either known to your Affiant through personal observation or have been obtained through reliable confidential sources, law enforcement reports and/or directly from other law enforcement officers.

9. On October 29, 2013, at approximately 1:30pm, Baltimore Police Department (BPD) Sergeant Jenkins and Detective Frieman were patrolling the area of the 4200 block of Fairfax Road, Baltimore, MD, in an unmarked patrol car. At that time, Sgt. Jenkins and Detective Frieman observed an individual later identified as Keon Dante JOYNER walking with his right hand clenched around an object with pieces of plastic hanging out of his grip. JOYNER entered the passenger side of a black Infiniti SUV bearing MD tag 2BE1805, occupied by an individual in the driver's seat later identified as HUNT. Sgt. Jenkins and Detective Frieman approached the Infiniti in their unmarked patrol car. Both HUNT and JOYNER had their heads down and did not see the patrol vehicle approaching. From his vantage point in the passenger's seat of the patrol car, which was closest to HUNT's vehicle, Detective Frieman observed HUNT holding a

large stack of money in his hands at approximately the height of the steering wheel. HUNT appeared to be counting the money.

10. Believing he was observing a narcotics transaction, Detective Frieman began to exit the passenger side of the police vehicle to investigate. HUNT looked up, dropped the large stack of money and immediately put his vehicle in reverse in an attempt to flee. HUNT reversed the vehicle for approximately 30 feet until he traveled over a curb and struck a light pole, disabling his vehicle. The passenger, JOYNER, opened the passenger side door and attempted to flee on foot. However, he was apprehended by Sergeant Jenkins. While exiting the vehicle, JOYNER dropped 2 plastic bags containing a tan rock substance (suspected heroin) along with his cellular phone and keys. Once JOYNER and HUNT were placed in custody, Detective Frieman recovered the suspected heroin and personal property of JOYNER.

11. During a search incident to arrest, Detective Frieman seized approximately \$2,157.00 from the driver's side floor of HUNT's vehicle along with HUNT's personal keys. \$290.00 was recovered from JOYNER. Shortly thereafter, JOYNER and HUNT were transported to CBIF. The vehicle was towed to City Yard. The two bags of suspected heroin were later weighed at police headquarters Evidence Control Unit for analysis and safekeeping. One bag weighed approximately 22 grams and the other bag weighed approximately 10 grams for a total of 32 grams of heroin.

12. During the booking process, HUNT provided the address of 4311 Crest Heights Road, Baltimore, MD. However, based on their review of private and public databases, investigators found that HUNT is the owner of 6555 Woodgreen Circle, Gwynn Oak, MD, 21207. Moreover, based on reliable confidential information, your

Affiant knew that HUNT is also associated with 2441 Callow Avenue in Baltimore, Maryland. A review of HUNT's phone records also show communications between HUNT and the owner/landlord of 2441 Callow Avenue. Therefore, investigators took HUNT's keys, which were seized at the time of his arrest, to 2441 Callow Avenue and determined that HUNT possessed keys to both the front door of 2441 Callow Avenue and Apartment 2A within that building.

13. Late on October 29, 2013, your Affiant submitted an application for a state search and seizure warrant to the Honorable District Court Judge of Mark Scurti of the District Court of Maryland, for 2441 Callow Avenue, Apartment 2A, Baltimore, MD. After review of the application, Judge Scurti issued the warrant.¹

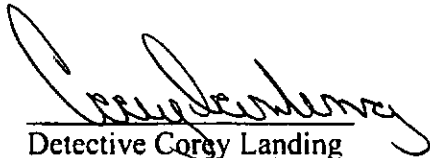
14. Just before midnight on October 29, 2013, members of DEA Group 52 and the Baltimore Police Department, Special Enforcement Section executed the search warrant for 2441 Callow Avenue, Apartment 2A, Baltimore, MD. Investigators seized approximately 2 kilograms of heroin (confirmed by a field test), a .357 revolver, a hydraulic kilogram press, a police scanner, cutting agents, and large amounts of CDS packaging material utilized for street level distribution.

15. A search warrant was also applied for and obtained on October 30, 2013 for 6555 Woodgreen Circle, in Baltimore Maryland, which HUNT owns. The warrant was executed the same day and investigators recovered 6.7 grams of heroin (confirmed by a field test) and a digital scale.

¹ In the affidavit in support of the search warrant application for 2441 Callow Avenue, your Affiant twice mistakenly referred to 2441 Callow Avenue as 3941 Callow Avenue. These were typographical, not substantive errors. Several other references in the affidavit correctly identified the address as 2441 Callow Avenue. The application and search warrant also correctly identified the location to be searched as 2441 Callow Avenue, Apt. 2A.

IV. Conclusion

16. Based on the forgoing, it is respectfully submitted that there is probable cause to believe that, on October 29, 2013, Andre HUNT possessed with intent to distribute more than 1 kilogram of heroin, in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A).



Detective Cory Landing
Task Force Officer
Drug Enforcement Administration

Subscribed to and sworn to before me on October 31, 2013.



Honorable Beth P. Gesner
United States Magistrate Judge